List of Entities with Greenhouse Gas Emissions Above 100,000 MT CO₂e in Washington State

The following list was prepared based on the assumptions noted below. The list is not a determination of entities that will be ultimately covered by the Clean Air Rule.

Businesses and organizations that emit 10,000 metric tons of carbon dioxide equivalent (MT CO_2e) per year or more in Washington are required to report their greenhouse gas (GHG) emissions on an annual basis. These reporting data were submitted to the Department of Ecology beginning with the 2012 emissions year¹.

One factor Ecology is considering when determining who is covered by the Clean Air Rule (CAR) is limiting the obligation to reduce GHG emissions to entities with average annual emissions equal to or exceeding 100,000 MT CO₂e (with some exemptions).

To evaluate the potential scope and size of the program, Ecology reviewed GHG reporting data from 2012 through 2014 to identify facilities with average emissions equal to or exceeding 100,000 MT CO_2e per year. They are on the list below. Ecology used different types of information, including GHG data submitted to EPA², to identify additional entities with emissions above this level that may be covered by the Clean Air Rule.

Depending on how the rule is set, additional entities may have an obligation while others on this list may fall off. This list is Ecology's best estimate of covered entities based on currently available data, and may change with future data availability.

Name	Sector
Agrium Kennewick Fertilizer Operations (KFO) - Kennewick	Chemicals
Alcoa Intalco Works - Ferndale	Metals
Alcoa Wenatchee Works - Malaga	Metals
Ash Grove Cement Company - Seattle	Minerals
Avista Corporation LDC - statewide **	Natural Gas Distributors
Boise Paper - Wallula	Pulp and Paper
BP Cherry Point Refinery - Blaine *	Refineries and Petroleum Fuel Producers
Cascade Natural Gas Corporation LDC - statewide **	Natural Gas Distributors
Cowlitz County Headquarters Landfill - Castle Rock	Waste
Frederickson Power LP - Tacoma	Power Plants
Georgia-Pacific Consumer Products LLC - Camas	Pulp and Paper
Grays Harbor Energy Center - Elma	Power Plants
Kaiser Aluminum Washington, LLC (Trentwood Works) - Spokane Valley	Metals
King County Solid Waste Cedar Hills Landfill - Maple Valley	Waste
Land Recovery Landfill Industrial - Graham	Waste
Longview Fibre Paper and Packaging, Inc/KapStone Kraft - Longview	Pulp and Paper

¹ Washington Mandatory Greenhouse Gas Reporting Program — Reported Emissions for 2012 and 2013

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² EPA GHG Reporting Data

Name	Sector
Nucor Steel Seattle, Inc, - Seattle	Metals
PacifiCorp Energy - Chehalis Generating Facility - Chehalis	Power Plants
Phillips 66 Ferndale Refinery - Ferndale *	Refineries and Petroleum Fuel Producers
Puget Sound Energy - Ferndale Generating Station - Ferndale	Power Plants
Puget Sound Energy - Goldendale Generating Station - Goldendale	Power Plants
Puget Sound Energy - Mint Farm Generating Station - Longview	Power Plants
Puget Sound Energy - Sumas Generating Station - Sumas	Power Plants
Puget Sound Energy LDC - statewide **	Natural Gas Distributors
REC Silicon - Moses Lake	Metals
River Road Generating Plant - Vancouver	Power Plants
RockTenn Tacoma Mill - Tacoma	Pulp and Paper
Roosevelt Regional Landfill - Roosevelt	Waste
Shell Puget Sound Refinery - Anacortes *	Refineries and Petroleum Fuel Producers
Spokane Waste to Energy Facility - Spokane	Waste
Terrace Heights Landfill - Yakima	Waste
Tesoro Refining & Marketing Company LLC - Anacortes *	Refineries and Petroleum Fuel Producers
U.S. Oil & Refining Co Tacoma *	Refineries and Petroleum Fuel Producers
WaferTech LLC - Camas	Manufacturing
Weyerhaeuser NR Company - Longview	Pulp and Paper
Cardinal FG Company - Winlock #	Minerals
Gas Transmission Northwest, LLC - Compressor Station 8 - Wallula #	Petroleum and Natural Gas Systems
Graymont Western US. Inc Tacoma #	Minerals
McCain Foods - Othello #	Food Production
Puget Sound Energy - Encogen Generating Station - Bellingham #	Power Plants
Puget Sound Energy LDC - statewide # %	Petroleum and Natural Gas Systems

^{*} Owners of refineries will likely have a compliance obligation as both a facility and as a petroleum fuel producer.

^{**} Natural gas distributors will likely have a compliance obligation for the fuel they supply to customers that is not already covered in the program.

[#] These facilities currently have average emissions under 100,000 MT CO₂e, but have had individual years with emissions above that level.

[%] Puget Sound Energy LDC - statewide will likely be part of the program as a natural gas distributor and may be part of the program as a facility.